IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
TRENTON VICINAGE

ATLAS DATA PRIVACY CORP., JANE DOE-1, JANE DOE-2, EDWIN MALDONADO, SCOTT MALONEY, JUSTYNA MALONEY, PATRICK COLLIGAN, and WILLIAM SULLIVAN *Plaintiffs*, v. MYHERITAGE LTD., MYHERITAGE (USA), INC., RICHARD ROES 1-10, *fictitious names of unknown individuals*, and ABC COMPANIES 1-10, *fictitious names of unknown entities*, *Defendant*.	Civil Action No.: 3:24-cv-04392 **MOTION FOR ADMISSION** **PRO HAC VICE**

PLEASE TAKE NOTICE that on May 6, 2024, or as soon thereafter as counsel may be heard, Defendants MyHeritage Ltd. and MyHeritage (USA), Inc., by and through its attorneys, McElroy, Deutsch, Mulvaney & Carpenter, LLP, shall move for an entry of an order pursuant to Local Civil Rule 101.1(c), admitting Alan Charles Raul, Esq. *pro hac vice*.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Defendants will rely upon the Declaration of Nicholas K. Lagemann, Esq. (Exhibit 1) and the Declaration of Alan Charles Raul, Esq (Exhibit 2). A proposed form of Order (Exhibit 3) is submitted herewith.

PLEASE TAKE FURTHER NOTICE that oral argument is not requested unless this Motion is contested.

Dated: April 1, 2024

McELROY, DEUTSCH, MULVANEY &
CARPENTER, LLP

/s/ Nicholas K. Lagemann
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 1, 2024, a true and correct copy of the foregoing

Motion for Admission Pro Hac Vice for Alan Charles Raul, Esq., was served on the following

counsel of record electronically by transmission to an electronic filing service provider for service

through the state's electronic filing manager:

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By: /s/ Nicholas K. Lagemann
        Nicholas K. Lagemann